

David M. Cook, Bar # 7043  
Attorney for the Debtors  
716 East 4500 South, Ste. N240  
Salt Lake City, UT 84107  
Phone: (801) 264-0699  
Fax: (801) 264-8494  
E-mail: cook@utlawyer.net

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

IN RE:       Audie Seljaas Lesa Seljaas  Address: 82 E 700 S, Kaysville, UT 84037 Last four digits of Social Security No: xxx-xx-4007 and xxx-xx-7678  Debtor(s).	Bankruptcy No. 14-24290 Chapter 13 Filed Electronically
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**Motion for Modification of Plan, Acceleration of Payments, Early Payoff & Discharge**

The Debtors, by and through Counsel, David M. Cook, hereby respectfully moves this Court for an Order Modifying the Chapter 13 Plan such that the plan payments are accelerated so that the Debtors can make a lump sum payment to pay off this bankruptcy consistent with the Order of Confirmation, so that the Debtors shall be entitled to a discharge as follows:

1. This case was filed April 25, 2014.
2. This is an over-median case.
3. The Plan was confirmed November 20, 2014, with an Order Confirming Plan entered December 19, 2014, at Docket No. 54.
4. Debtors are realizing sufficient funds from the sale of their home to pay off the balance remaining to pay off this Chapter 13 and desire to do so. A payoff quote has been requested from the Chapter 13 Trustee, together with additional commissions and

attorney's fees, so as to enable Debtors to no longer need to be in a bankruptcy case.

THEREFORE, Debtors respectfully requests that this Court modify the Chapter 13 plan to approve the acceleration of payments for early payoff and discharge, and allow \$500.00 for attorney's fees as an administrative expense under 11 U.S.C. §503(b) from available funds.

DATED this July 16, 2015.

/s/ David M. Cook  
Attorney for Debtors